

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:14-cr-153 ERW (TCM)
)
JAMES STALEY,)
)
 Defendant.)

SECOND MOTION TO CONTINUE SENTENCING

COMES NOW Defendant, James Staley, by and through counsel, and hereby moves this Court to continue the sentencing hearing, presently scheduled for August 19, 2015, to the week of September 7, 2015. In support of this motion, Defendant states as follows:

1. Defendant's sentencing is scheduled for August 19, 2015.
2. Counsel filed Defendant's first motion to continue sentencing on July 22, 2015.
3. This Court granted that motion and moved Defendant's sentencing hearing from July 29, 2015 to August 19, 2015.
4. After conferring with Defendant, however, counsel was reminded that Defendant would be on his Court-approved vacation with his wife, children and parents from August 15 - August 25, 2015.
5. Defendant's parents have made multiple reservations and have placed several non-refundable deposits for their trip, including a boat rental on the date of the current sentencing hearing.
6. For the above reason, Defendant files the instant motion.

7. Counsel is currently set for trial on August 31, 2015 in State of Missouri vs. John Mazur, 1322CR327-01. Counsel expects that trial to last the full week of August 31.

8. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Dianna Collins. Ms. Collins objects to Defendant's request because the case agent plans to leave the St. Louis area and move to Virginia on August 26, 2015.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the sentencing presently scheduled for August 19, 2015, to the week of September 7, 2015.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Dianna Collins Assistant United States Attorney.